

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:24-CR-00507
	§	
GHOLAM REZA GOODARZI	§	

**UNOPPOSED MOTION TO CONTINUE JURY TRIAL
AND TO ENTER A NEW SCHEDULING ORDER**

TO THE HONORABLE CHARLES ESKRIDGE, UNITED STATES DISTRICT JUDGE
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, GHOLAM REZA GOODARZI, defendant, moves this Honorable Court to continue the jury trial and to enter a new scheduling order and for good cause would show as follows:

I.

Pretrial conference is set for March 28, 2025, at 9:30 a.m., and jury trial is set for April 1, 2025, at 9:30 a.m.

II.

Counsel for defendant requests a continuance of at least 120 days to a date after July 30, 2025, for the following reasons. Counsel needs the additional requested time to continue to review the voluminous discovery already received. Counsel anticipates receiving the final declassification of the remaining reports from the FBI in the near future. At this time, discovery production is not yet complete. Counsel needs the additional time with defendant in order to effectively evaluate the evidence, prepare motions, enter into meaningful plea negotiations, and/or adequately prepare for trial. Additionally, counsel has multiple trial settings from April 2025 to July 2025.

III.

Based on the reasons presented herein, Defendant respectfully requests that this Honorable Court continue the trial date of April 1, 2025, for at least 120 days to a date after July 30, 2025. A continuance of the trial setting should be excluded from the Speedy Trial limitations pursuant to 18 U.S.C. § 3161(h)(8)(A) for the ends of justice are served by such continuance and the need for the continuance outweighs the best interest of the public and the defendant in a speedy trial.

This motion is made not for the purpose of delay, but that justice may be done. WHEREFORE, PREMISES CONSIDERED, Defendant, respectfully prays that the Court grant this motion.

Respectfully submitted,

/s/ Kent A. Schaffer

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CERTIFICATE OF CONFERENCE

Counsel for defendant conferred with AUSA Heather Winter concerning her position on Defendant's Motion for Continuance. Ms. Winter stated that the Government is unopposed to this motion.

/s/ Kent A. Schaffer
KENT A. SCHAFFER

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an email notification of this filing to all registered parties.

/s/ Kent A. Schaffer
KENT A. SCHAFFER